

### III. REMARKS

Claims 1, 23, and 35 are amended to correct minor typographical errors. Claim 23 is further amended to clarify the sequence of steps. There is no change in the scope of the claimed subject matter. Claims 1-36 are submitted for reconsideration in view of the following remarks. Applicant has considered the Examiner's comments presented in the Office Action mailed September 11, 2006.

Reconsideration of the application is respectfully requested.

#### The Office Action

Claims 1-7, 10-12, 14-27, 29-31, and 34-36 stand rejected under 35USC103(a) on the basis of the combined teaching of the cited reference Blackburn, U.S. Patent No. 3,891,123 and the reference Pittendreigh, U.S. Patent No. 3,192,744.

This rejection is traversed for the following reasons:

The combined teaching of the reference Blackburn in view of Pittendreigh does not render the subject matter of Claims 1-7, 10-12, 14-27, 29-31, and 34-36 obvious because it fails to teach or otherwise suggest each and every limitation of the claims. It is well established that to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 U.S.P.Q. 580 (C.C.P.A. 1974). See also *In re Wilson*, 165 U.S.P.Q. 494 (C.C.P.A. 1970).

In particular claim 1 states:

**"a system controller connected to said payment processor, said washing sequence controller, and said dispensing controller to receive inputs therefrom and to generate and send control signals thereto according to a predetermined control sequence"**

This element of the claimed system enables a centralized control of the functions of an array of washing machines including payment, working fluid distribution, and washing cycle.

The Examiner states, in the last paragraph of page 2 of the office action, that programmer 40 operates in conjunction with programmer 60 to provide automatic dispersion of supplies to individual washing machines. First this is inaccurate as

programmer 60 is an alternate embodiment of programmer 40 and there is no indication of any combined function (see column 2, line 53 to column 3, line 30). Programmer 40 or programmer 60 is connected to operate a solenoid valve associated with a dispenser tank on each of the washing machines to dispense chemical additives to the machine. No other purpose or capability is taught in the reference Blackburn for the programmers 40 and 60. In the system of Blackburn a programmer is required for each machine to control the supply of different chemical additives at an individual machine. There is no suggestion that the programmers 40 or 60 of Blackburn be adapted to centrally control distribution of working fluids to a group of machines. Accordingly, there is also no suggestion that the programmers of Blackburn serve any other function. Blackburn therefore fails to disclose or suggest the above feature of claim 1.

Claim 1 also states:

**"a payment processor constructed to receive and approve a payment medium presented by the user according to a predetermined payment sequence;"**

In spite of the indicated narrow function and absence of capability of the programmers of Blackburn, the Examiner suggests that it would be obvious to adapt these programmers to receive a signal from the coin slot control mechanism 60 of the cited reference Pittendreigh. The coin slot control mechanism is the well known "coin operated machine" mechanism, that mechanically receives a coin and mechanically operates a switch to start a machine. This does not constitute a payment processor in the context of the claims of this application.

There is no suggestion in Pittendreigh of generating a signal that can be used for activating a digital controller for multiple washing machines. Therefore there is no disclosure or suggestion of a payment processor that performs a payment transaction and generates an output usable by a system controller. The disclosure of Pittendreigh is for a system for minimizing the effect of excessive suds in an individual washing machine. There is no indication that any portion of this system would be adaptable to a group of machines or usable in anyway by a system controller as required by the claims of this application.

Claim 1 further states:

**"a dispensing controller for controlling said centralized**

**fluid distribution system according to a predetermined dispensing sequence;"**

Based on the teaching of programmers 40 and 60 of Blackburn, the Examiner avers that it would have been obvious to provide a dispensing controller according to claim 1. As previously discussed, the programmers of Blackburn service one machine, not a group of machines. Blackburn states at column 2, lines 53-59, as follows:

**"Referring to FIG.2, this control circuit relates to a programmer of the type initiating a single signal. A programmer 40 for each washing machine serves to control a plurality of supplies such as "supply 1", "supply 2", etc. and uses a single output connection 41."**

Therefore Blackburn fails to disclose or suggest a dispensing controller for controlling a centralized dispensing system for multiple washing machines of a facility, as described in claim 1. To the contrary, Blackburn's controllers 40 or 60 control the dispensing of multiple additives to a single machine.

Claim 1 is directed to a system for controlling multiple washing machines in a facility utilizing a control hierarchy consisting of specific function controllers for processing dispensing, paying and washing for the all of the machines in a facility. These function controllers report to the system controller which effectively directs the function of the facility. Blackburn teaches a distribution system for chemical additives used in multiple machines, but the control function is decentralized to the individual machines. As stated above Pittendreigh describes a suds control for an individual machine. The combined teaching of these references fails to disclose or suggest a system for controlling multiple washing machines of a facility.

Summarizing the above, the combined teaching of Blackburn and Pittendreigh fails to disclose the claimed feature of a centralized controller for operating the payment for and distribution of working fluids, as well as the activation of the operating cycles of a group of laundry machines in association with the requisite payment transaction. The combined teaching of Blackburn and Pittendreigh also fails to disclose or suggest a payment processor or a dispensing controller as required by claim 1 of this application.

The above remarks also traverse the grounds for rejection of the related claims 2-21, dependent from claim 1, as all of the above

referenced limitations of claim 1, are also part of these claims.

The rejection with respect to claim 2 is further traversed because of the following:

The combined teaching of Blackburn and Pittendreigh fails to disclose or suggest a user interface that allows the user to make selections in response to prompts. As indicated above the combined teaching fails to disclose or suggest a system controller, accordingly there can be no user interface according to claim 2.

The rejection with respect to claim 3 is further traversed because of the following:

The combined teaching of Blackburn and Pittendreigh fails to disclose or suggest a gang controller that monitors and controls individual washing machines. The Examiner's suggestion that the teaching of programmer 40 in Blackburn **"allows for the group control of washing machines 27"** is unsupported by the reference. programmer 40 controls the supply of multiple additives to an individual machine. It has nothing to do with the control of the washing machine nor is it capable of controlling a plurality of washing machines.

The rejection with respect to claim 4 is further traversed because of the following:

The combined teaching of Blackburn and Pittendreigh fails to disclose or suggest a pump, a distribution manifold and valve system as described in claim 4, wherein the pump and valves are controlled by the dispensing controller. There is no dispensing controller for the facility only a programmer for an individual machine. The pump 16 of Blackburn is controlled by float switch 21 of head tank 19 to deliver fluid from holding tank 14 to head tank 19. The head tank 19 supplies fluid, by gravity feed, directly to dispenser tank 24 at each machine (see column 2, lines 27-29). There is no teaching of a distribution manifold according to claim 4.

The rejection with respect to claim 5 is further traversed because of the following:

The combined teaching of Blackburn and Pittendreigh fails to disclose or suggest a system of sensors to monitor flow continuity in the fluid distribution system. The Examiner

refers to "respective solenoid sensors 29" as supporting the rejection. There are no solenoid sensors only solenoids 29. Solenoids are electrically triggered actuators and are not generally used or recognized as sensors. The float switch 21 does not constitute a system of sensors for monitoring flow continuity.

The rejection with respect to claims 23-34 is traversed on the following grounds:

The combined teaching of Blackburn and Pittendreigh fails to disclose or suggest a system that is capable of performing the method of claims 23-34. There is no user interface that is capable of prompting the user; to initiate the presentation of a payment medium, to select a washing machine, or to select a working fluid, described or implied in the either of the cited references. There is no capability in the combined teaching for processing a transaction for payment of a selected a working fluid and washing machine. There is no disclosure anywhere in the combined teaching of the cited references, that the dispensing of a working fluid is contingent on a payment transaction being processed and verified.

Claims 8-9, 28, and 32-33 stand rejected under 35USC103(a) based on the combined teaching of Blackburn and Pittendreigh in view of the teaching of Bruntz, U.S. Patent No. 5,978,995. This rejection is traversed on the following grounds:

The temperature sensors according to the claims are used for monitoring the temperature of the working fluid. The reference Bruntz discloses a system for adjusting the temperature of the wash and rinse cycle of a washing machine. There is no indication in Bruntz or the combined teaching that the temperature of the soap or other additive is of any interest whatsoever. Nor is there any disclosure or suggestion in Bruntz of a means by which to accomplish the temperature sensing of the working fluid. Bruntz therefore, fails to remedy the deficiencies of the combined teaching of Blackburn and Pittendreigh.

The rejection of claims 35 and 36 is traversed on the same grounds as indicated above for claim 4.

The combined teachings of the cited references do not, therefore, support a prima-facie case of obviousness with respect to any of the claims. The modification of the teachings of Blackburn, Pittendreigh and/or Bruntz, in order to obtain the

invention, as described in any of the claims submitted herein, would not have been obvious to one skilled in the art.

The Examiner has combined references where there is no incentive or encouragement to do so. The system of Blackburn is used in a commercial laundry, where there is no "pay-as-you-go" operation. It is operated by trained individuals who operate the system as part of an industrial laundry. The system of Pittendreigh is designed to limit the occurrence of excessive suds in an individual washing machine. Although the individual washing machine in Pittendreigh may be coin operated, a person skilled in the art would not be inclined to insert a coin operation function in the industrial wash process of Blackburn. Such a combination would only interfere with the orderly operation of a commercial laundry. As previously stated, such "coin operation", even if suitably combinable with the system of Blackburn would not render the payment processor of this application obvious.

Section 2142 of the Manual of Patent Examining Procedure indicates the following:

**"To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria."**

Applicant submits that the Examiner has failed to present a *prima facie* case of obviousness because there is no suggestion or motivation to make any of the combination of teachings proposed by the Examiner. In addition, even if the teachings of the cited references were combined, these teachings fail to teach or suggest all of the claim limitations.

For all of the above reasons, it is respectfully submitted that all of the claims now present in the application are clearly

novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested.

Respectfully submitted,

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